

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA : Criminal Action No. 21-53-LPS  
:   
vs. :   
:   
JAMES CROSSAN :

**ORDER**

**AND NOW**, this                      day of                      , 2021,

upon consideration of Defendant James Crossan's Unopposed Motion for Disposition of Property, **IT HEREBY ORDERED** that said motion is **GRANTED**. Defendant's non-forfeitable firearms shall be transferred to X-Ring Supply, LLC, a federally licensed firearms dealer in Newark, Delaware, for sale at market value on behalf of Defendant.

These firearms are as follows:

1. Springfield Armory handgun – serial # US699680
2. 1911 handgun – serial # AOA39983
3. Makarov handgun – serial # A002058
4. PW Arms Redmond revolver – serial # 17400
5. Mod E-15 revolver – serial # 19706
6. Haskell MFG handgun – serial # 003565
7. M57 handgun – serial # J-238295
8. CZ75BD handgun = serial #C926232
9. US 1847 revolver – serial # D55351
10. .38 special revolver – serial # 1740429
11. Harper's Ferry 1807 pistol – serial # PD41155
12. Ruger 10/22 – serial # 0013-58098
13. Century International Arms long gun – serial # M70AB24682
14. Bushmaster Firearms long gun – serial # BFH023905
15. Mossberg 12-gauge shotgun – serial # V0677443
16. Henry Repeating Arms long gun – serial # 4570SSR00971
17. PTR Industries long gun – serial # G18059
18. Anderson Manufacturing AM-15 rifle – serial # 17005910

19. Parker Hale Ltd. rifle – serial # 3907
20. Howa 1500 Hogue rifle – serial # B565784
21. 7.62 1943 rifle – serial # AN7466
22. SOS Imports 12 GA rifle – serial # LH009253
23. Rifle – serial # 47041
24. Bolt action rifle – serial # 30900
25. Denali pistol – serial # K0691

Defendant shall not possess or exercise any control over these firearms at any point.

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The Honorable Leonard P. Stark  
United States District Court Judge

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JAMES CROSSAN	:	

**DEFENDANT'S UNOPPOSED MOTION  
FOR DISPOSITION OF PROPERTY**

**TO THE HON. LEONARD P. STARK, JUDGE OF SAID COURT:**

**AND NOW** comes Defendant James Crossan, by her attorney, Thomas A. Dreyer, Esquire, and respectfully requests the Court to enter an Order transferring her non-forfeitable firearms to a licensed federal firearms dealer for sale on the open market on her behalf and, in support thereof, avers the following:

1. On June 12, 2020, Defendant was arrested at her place of employment, her residence located at 8309 Rembrandt Circle, Newark, Delaware was searched by special agents of the Federal Bureau of Investigation and numerous items, including 25 firearms legally owned and possessed by her, were seized by the agents.

2. Defendant was a hobbyist gun collector and historian who kept his firearms locked in a cabinet in his apartment.

3. Defendant's firearms were not involved in any criminal activity.

4. On September 10, 2021, Defendant pleaded guilty to a one-count Information charging her with Receipt of child pornography in violation of 18 U.S.C. 2252A(a)(2) and (b).

5. Pursuant to Paragraph 9 of their Memorandum of Plea Agreement, the parties agreed that Defendant is permitted to file the instant motion prior to Sentencing pursuant to *Henderson v. U.S.*, 575 U.S. 622, 135 S.Ct. 1780, 1786, 191 L.Ed.2d 622 (2015) (One way to ensure that the felon is prevented from later exercising control over the weapons is to order that the guns be turned over to a firearms dealer, himself independent of the felon's control, for subsequent sale on the open market.)

6. Sentencing is scheduled for December 21, 2021.

7. At Defendant's request, Mr. Dreyer has contacted the following licensed federal firearms dealer:

X-Ring Supply, LLC  
2201 Ogletown Road  
Newark, DE 19711  
302-737-6575

8. X-Ring Supply, LLC has agreed to deny Defendant possession of, access to or influence over the firearms.

9. X-Ring Supply, LLC has agreed to take possession of Defendant's firearms, to legally sell them on the open market on Defendant's behalf, to take a fee of 20% of the gross sales price for his services and to remit the balance to Mr. Dreyer for Defendant's benefit.

10. The government has no objection to this request.

11. As long as this process precludes Defendant from exercising control over the firearms, *Henderson* authorizes the Court to approve their transfer to X-Ring Supply, LLC. *Id.* at 1786.

**WHEREFORE**, Defendant respectfully requests that the Court grant the

instant motion.

**/s/ Thomas A. Dreyer**

Thomas A. Dreyer, Esquire

30 Running Brook Road

Glen Mills, PA 19342

610-742-7883

Attorney for Defendant James

Crossan

Dated: October 27, 2021

**CERTIFICATE OF SERVICE**

Thomas A. Dreyer, Esquire, hereby certifies that he served a true and correct copy of the within Motion to Extend Deadline by Which to File Pretrial Motions upon the persons named below on the date listed below by the Electronic Court Filing (“ECF”) System:

Carly Hudson, Esquire  
Assistant United States Attorney  
The Hercules Building  
1313 North Market Street,  
Suite 400  
Wilmington, DE 19801

**/s/ Thomas A. Dreyer**  
Thomas A. Dreyer, Esquire  
30 Running Brook Road  
Glen Mills, PA 19342  
610-742-7883  
Attorney for Defendant James Cross  
Crossan

Dated: October 27, 2021